

12.3.138 v.4
11-1-99

SPILL PREVENTION AND COUNTERMEASURE PLAN

LONGVIEW FIBRE COMPANY

CONTACT
TOM CRAIG - PLANT MANAGER

11-01-99
Revised
10-05-98
01-22-98
Original
02-08-96

1. NAME AND OWNERSHIP

NAME

LONGVIEW FIBRE COMPANY
5901 EAST MARGINAL WAY SOUTH
SEATTLE, WA. 98134
TELEPHONE (206) 762-7170

MANAGER

TOM CRAIG
4616 S. W. MASSACHUSETTS
SEATTLE, WA. 98116
TELEPHONE (206) 933-6392

OWNER

LONGVIEW FIBRE COMPANY
PO BOX 3000
LONGVIEW WA. 98632

Other Personnel - Approximately 100 employees including factory workers, supervisors, clerical, salespeople, and managers.

Service area - We are not shipping or transporting product that would be included in spill prevention.

2. DESCRIPTION OF FACILITY

This plant manufactures, warehouses, and ships corrugated products which do not fall into the Spill Prevention Program. The accompanying drawing shows property boundaries and adjacent roadway, drainage ditches, on site buildings and storage tanks significant to this report. We do purchase, store and consume certain chemicals and oils which follows later in this plan.



LFC002015

Fixed Storage:

1. One 10,000 gallon waste water storage tank.
2. One 5,000 gallon waste water treatment tank.
3. One 3,000 gallon treated water storage tank.
4. One 5,000 gallon double lined diesel oil tank - stand by fuel.
5. One 150 gallon preparation tank (Vortex TM Mixer).
6. Two 300 gallon starch holding tanks.
7. One 4,000 gallon bulk caustic storage tank.
8. One 225,000 lb. dry starch silo.
9. Twelve 65 gallon ink base storage tanks.
10. Seven 55 gallon recycle ink storage tanks.
11. Twenty Five 40 lb. Propane fuel tanks.

The fixed storage is either inside the building, or secured so it can not be tampered with.

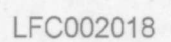
The propane, (fuel for lift trucks), is enclosed in a fenced area with a locked gate. These tanks are fill for us by Ball Foster.

Other Storage:

Bennet - Acetylene in pressure cylinders.
Bennet - Oxygen in pressure cylinders
Printing ink - 5 gallon pails.
Glue - Liquiplex bins.
Wb 6340 Starch additive cor-weld poly tote.
Borax - Starch additive in 50 lb. bags.
Unocal UNAX AW 32
Unocal UNAX AW 46
Unocal UNAX AW 150
Unocal MP GEAR LUBE LS 80W\90
Unocal TURBINE OIL 22
Unocal GUARDOL SAE 10
Unocal GUARDAL SAE 30
Unocal NLGL 6 EP
Unocal NLGL 8 EP
Unocal HYDRAULIC OIL AW 46
CH2O 6151 Boiler Water Treatment - 55 gallon drum
CH2O 6262 Boiler Water Treatment - 30 gallon drum
CH2O 6388 Boiler Water Treatment - 55 gallon drum
CH2O 6656 Boiler Water Treatment - 55 gallon drum
Regular gasoline - 5 gallon can
Polymac 6-4622 poly tote
B-45 & Polymer - plastic jugs
08 Load Fast SB-EZEZ - 275 gallon poly tote.
Ink base - 55 gallon drumplex.

CHEMICAL STORAGE AREAS AT LONGVIEW FIBRE COMPANY -- SEATTLE

- Area A. Fire proof cabinet containing paint, paint thinner, and gasoline.
- Area B. Open shelf storage of ink, flexo wash up soap and glue lap adhesive.
- Area C. Fire proof cabinet containing alcohol, defoamer, slip wax, smooth lay, resol and Molykote 557.
- Area D. Fire proof cabinet containing alcohol, Molykote 557, and non-skid indicator.
- Area E. Open storage non-skid size.
- Area F. Open and rack storage of oil, borax, starch and resin.
- Area G. Tank storage of caustic.
- Area H. Storage of boiler chemicals.
- Area I. Tank storage of diesel.
- Area J. Storage silo dry starch.
- Area K. Storage of water treatment chemicals.
- Area L. Storage of oil in 55 gallon drum.
- Area M. LP gas storage.
- Area N. Ink blending chemicals and ink bases storage.
- Area O. Fire proof cabinet containing contact cement and die sealer.



3. PAST SPILL EXPERIENCE

Oil spill, ground contamination, as much oil as possible was collected and recycled. Contaminated ground was removed and clean fill replaced it.

4. A. SPILL PREVENTION - FIXED STORAGE

1. Stand-by fuel is never handled by employees
2. Lift truck propane fuel is filled off site by Ball Foster. Full and empty tanks are in a fenced enclosure with a locked gate. Tanks are hand carried to and from lift trucks.
3. The starch adhesive mixing and holding tanks are pumped from one tank to another and to our corrugator. This pumping occurs only when the corrugator is running, under the direct supervision of the corrugator supervisor.

4. B. SPILL PREVENTION - OTHER STORAGE

1. Gasoline and other items such as thinner, paint, and cans of adhesive, are stored in fire proof cabinets.
2. The Liquiplex bins of adhesive and coatings are stored where we feel they are safe. They are moved to our machines when needed by lift truck.
3. Corn starch is kept in an area where it is being used and is used as needed in the making of starch adhesive.

5. SPILL PREVENTION - VEHICLES

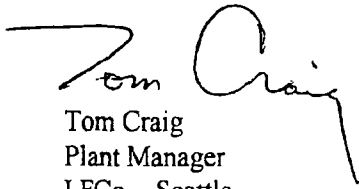
- A. On Site
The only vehicular spill we are concerned about is when our lift trucks move the 55 gallon drums and the liquiplex bins from our receiving dock to points of storage, or from storage to area of use. All lift truck operators have been trained in proper handling and have been cautioned to handle these containers with great care.
- B. Off Site
This is not a concern, as we do not haul or store above chemicals off site.

6. PERSONNEL

All personnel have been instructed and trained in the following spill prevention and countermeasure plans:

1. Maintenance employees have been trained and instructed regarding oil and glue spills, containment, and retrieval methods.
2. Instructions and telephone numbers have been posted regarding the reporting of a spill to the state and local departments of the EPA.

Our facility has all waste water being recycled by a Beckart water treatment system for reuse in our plant.



Tom Craig
Plant Manager
LFCo -- Seattle

SPILL PREVENTION CONTROL, AND COUNTERMEASURE PLAN

LONGVIEW FIBRE COMPANY

CONTACT

N.L. BUCKHOLZ - PLANT MANAGER

1. Name and Ownership

NAME

LONGVIEW FIBRE COMPANY
5901 East Marginal Way S.
Seattle, Washington 98124
Telephone: (206) 762-7170

MANAGER

N.L. BUCKHOLZ
29630 11TH AVE SW
Federal Way, Wa. 98023
Telephone: (206) 839-3937

OWNER

LONGVIEW FIBRE COMPANY
P.O. Box 3000
Longview, Wa. 98632

Other Personnel - Approximately 102 employees including factory workers, supervisors, clerical, salespeople, and managers.

Service area - We are not shipping or transporting product that would be included in spill prevention.

2. Description of Facility

This plant manufactures, warehouses, and ships corrugated products which do not fall into the Spill Prevention Program. The accompanying drawing shows property boundaries and adjacent roadway, drainage ditches, onsite buildings and storage tanks significant to this report. We do purchase, store and consume certain chemicals and oils which follows later in this plan.

Fixed Storage:

1. One 5000 gallon double lined diesel oil tank - stand-by-fuel
2. One 150 gallon preparation tank (Vartex TM Mixer)
3. Two 300 gallon starch holding tanksg tank
4. One 4000 gallon bulk caustic storage tank
96" x 152" 1.5 specific gravity with a 0.562" wall
5. One 3000 gallon waaste water storage tank
6. One 225,000# dry starch storage silo

The fixed storage is either inside the building, or secured so it cannot be tampered with.

The propane for lift trucks is enclosed in a fenced area with a locked gate and contained in 40# tanks filled by Ball InCon.

Other storage:

Bennett - Acetylene in pressure cylinder
Bennett - Oxygen in pressure cylinder
Printing ink - 5 gallon plastic pails
Glue - Liquiplex bins
Michelman 40H - 55 gallon drum
Michelman X300 - 55 gallon drum
Resin - Starch additive - Liquiplex bin
Borax - Starch additive - bags
UNOCAL UNAX AW32
UNOCAL UNAX AW 46
UNOCAL UNAX AW 150
UNOCAL MP GEAR LUBE LS 80W/90
UNOCAL TURBINE OIL 22
UNOCAL GUARDOL SAE 10
UNOCAL GUARDOL SAE 30
UNOCAL NLGL 6 EP
UNOCAL NLGL 8 EP
UNOCAL HYDRAULIC OIL AW 46
WT 105 Boiler Water Treatment - 55 Gallon drum
WT 102 Boiler Water Treatment - 55 Gallon drum
WT 106 Boiler Water Treatment 100# Kegs
WT 104 Boiler Water Treatment - 55 Gallon drum
WT 202 - 55 gallon drum
222 - Non Skid Liquiplex Bin
Regular gasoline - 5 Gallon can

3. Past Spill Experience

Oil spill, ground contamination, as much oil as possible was collected and recycled. Contamination ground removed and clean fill replaced it.

4. A. Spill Prevention - Fixed Storage

1. Stand-by fuel is never handled by employees.
2. Lift truck propane fuel is filled off site by Ball InCon. Full and empty tanks are in a fenced enclosure with a locked gate. Tanks are hand carried to and from lift trucks.
3. The starch adhesive mixing and holding tanks are pumped from one tank to another and to our corrugator. This pumping occurs only when corrugator is running, under the direct supervision of the corrugator supervisor.

B. Spill Prevention - Other Storage

1. Gasoline and some other items such as thinner and some gallon cans of adhesive are stored in a fire proof cabinet.
2. The Liquiplex bins of adhesive and coating are stored where we feel they are safe. They are moved to machines when needed by lift truck.
3. Corn starch is kept in an area where it is being used and is used as needed in the making of starch adhesive.

5. Spill Prevention - Vehicles

1. On Site

The only vehicular spill that we are concerned about is when our lift trucks move the 55 gallon drums and the Liquiplex bins from our receiving dock to points of storage, or from storage to the area where they will be used. All lift truck operators have been cautioned to handle with great care.

2. Off Site

This is not a concern, as we do not haul or store above chemicals off site.

6. Personnel

All personnel have been instructed and trained in the following spill prevention and countermeasure plans:

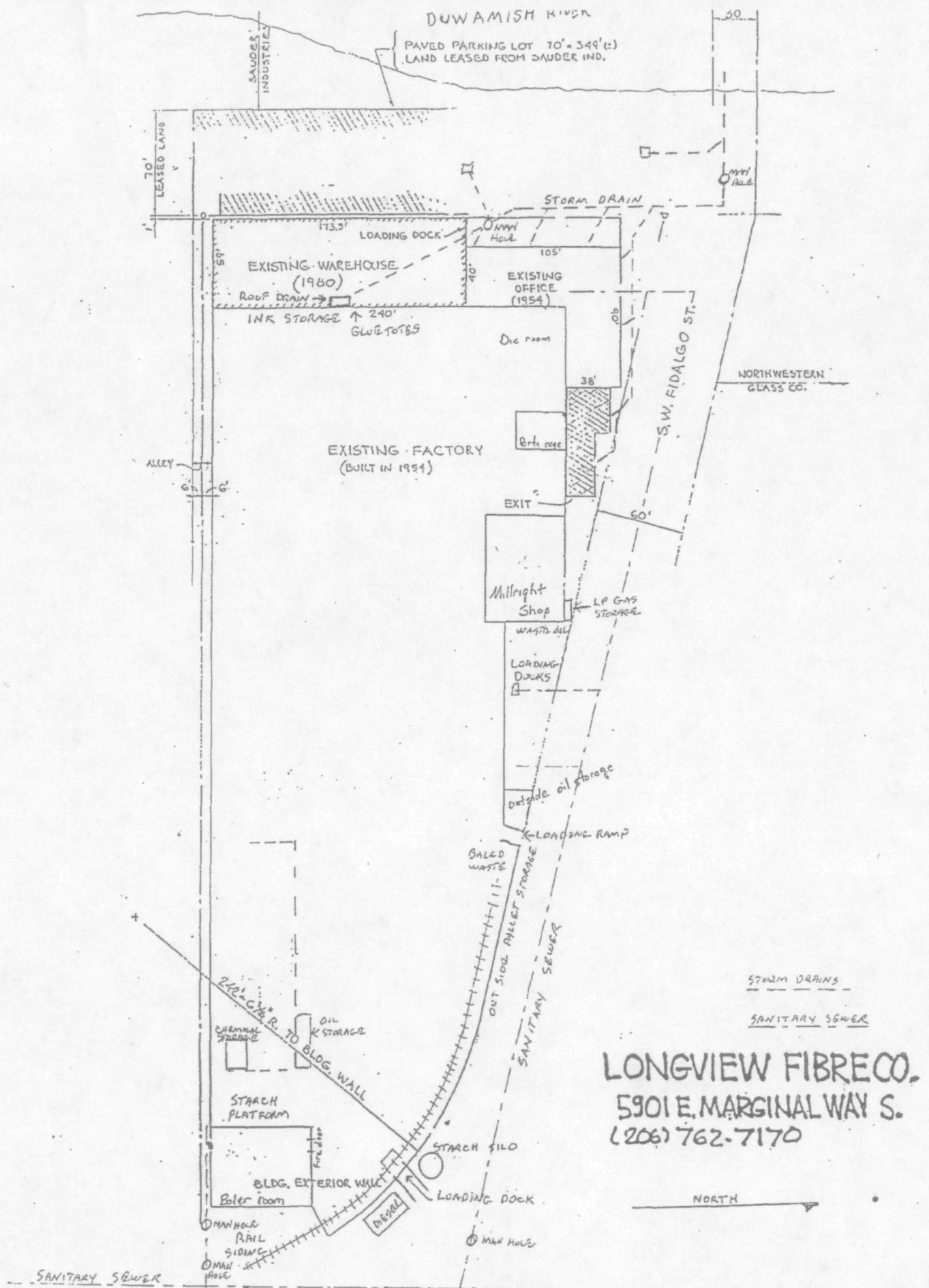
1. Maintenance employees have been trained and instructed regarding oil and glue spills, containment, and retrieval methods.
2. Instructions and phone numbers have been posted regarding the reporting of a spill to the state and local departments of the EPA.

Our facility has all waste water being disposed of by sanitary sewer.



Norman L. Buckholz
Plant Manager

NLB:jcm



SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

LONGVIEW FIBRE COMPANY

CONTACT

TOM CRAIG - PLANT MANAGER
2/08/96

1. Name and Ownership

NAME

LONGVIEW FIBRE COMPANY
5901 East Marginal Way So.
Seattle, WA 98134
Telephone: (206) 762-7170

MANAGER

TOM CRAIG
1728 Palm Ave S.W.
Seattle, WA 98116
Telephone: (206) 933-6392

OWNER

LONGVIEW FIBRE COMPANY
P.O. Box 3000
Longview, WA 98632

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4. One 4000 gallon bulk caustic storage tank 96" x 152" 1.5 specific gravity with a 0.562" wall
5. One 3000 gallon waste water storage tank
6. One 225,000# dry starch storage silo

The fixed storage is either inside the building, or secured so it cannot be tampered with.

The propane for lift trucks is enclosed in a fenced area with a locked gate and contained in 40# tanks filled by Ball-Incon.

Other storage:

Bennet - Acetylene in pressure cylinder
Bennet - Oxygen in pressure cylinder
Printing Ink - 5 gallon plastic pail
Glue - Liquiplex bins
Michelman 4011 - 55 gallon drum
Michelman X300 - 55 gallon drum
Resin - Starch additive - Liquiplex bin
Borax - Starch additive - Liquiplex bin
Unocal UNAX AW 32
Unocal UNAX AW 46
Unocal UNAX AW 150
Unocal MP GEAR LUBE LS 80W/90
Unocal TURBINE OIL 22
Unocal GUARDOL SAE 10
Unocal GUARDOL SAE 30

Unocal NLGL 6 EP
Unocal NLGL 8 EP
Unocal HYDRAULIC OIL AW 46
CH20 6151 Boiler Water Treatment - 55 gallon drum
CH20 6262 Boiler Water Treatment - 30 gallon drum
CH20 6388 Boiler Water Treatment - 55 gallon drum
CH20 6656 Boiler Water Treatment - 55 gallon drum
222 Non Skid - Liquiplex Bin
Regular gasoline - 5 gallon can

3. Past Spill Experience

Oil spill, ground contamination, as much oil as possible was collected and recycled. Contamination ground removed and clean fill replaced it.

4. A. Spill Prevention - Fixed Storage

1. Stand-by fuel is never handled by employees.
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A. On Site

The only vehicular spill that we are concerned about is when our lift trucks move the 55 gallon drums and the Liquiplex bins from our receiving dock to points of storage, or from storage to the area where they will be used. All lift truck operators have been cautioned to handle with great care.

B. Off Site

This is not a concern, as we do not haul or store above chemicals off site.

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All personnel have been instructed and trained in the following spill prevention and countermeasure plans:

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2. Instructions and phone numbers have been posted regarding the reporting of a spill to the state and local departments of the EPA.

Our facility has all waste water being disposed of by sanitary sewer.

Tom Craig
Plant Manager

SUBJECT

SLB

CORPORATE - GENERAL
SPILL PREVENTION, CONTROL AND
COUNTERMEASURE PLANS
R. P. Wollenberg

Date 9-16-86
Supersedes Issue
Of NEW
C - Denotes Change

ISSUED BY

Spills (including leaks of oil and oil products, other hazardous chemicals, and overflows of containment systems) must not occur often. However, when they do occur, we must respond quickly and correctly to prevent excessive damage and cost, and to comply with federal, state, and local requirements. We must make sure that we have given forethought to the possible effects of a spill and how we will respond. Prior planning will reduce the frequency and impact of spills, the cost of cleanup, and the likelihood of noncompliance with environmental regulations. The following policy must be followed at all Longview Fibre Company locations, including Timber operations.

1. A Spill Prevention, Control and Countermeasure (SPCC) Plan must be written for each location. The Plan must address both aboveground and underground storage and handling.
2. Four basic principles should be embodied within an SPCC Plan:
 - a. The practices devoted to the prevention of spills.
 - b. The plan of containment should a spill occur.
 - c. The plan for cleanup of a spill.
 - d. The plan for notification of the appropriate individuals or agencies.

The SPCC Plan must also include the following: a description of the facility, its operations and the disposal of wastewater; a list of all oil, oil products and other hazardous materials used, processed, or stored at the facility; a drawing, showing storage tanks and chemical storage areas; and a map showing nearby surface water, wells, and populated areas.

3. The SPCC Plan must be reviewed periodically with those individuals responsible for following it so that they can respond quickly and correctly.
4. The SPCC Plan must be updated at least annually (more often where required by law).
5. A copy of the SPCC Plan (and each update) must be sent to the Technical Department at Longview for review.
6. Copies of sample SPCC Plans are available from the Longview Technical Department (Environmental Section).

CC: WLB/SLB

APPENDIX B
SAMPLE SPCC PLAN

Spill Prevention Control and Countermeasure Plan

ABC OIL COMPANY
100 Naverspill Road
Post Office Box 100
Oilville, Washington 98000
Telephone (123) 456-7890

Contact
John Doe, Owner & Manager

Certification:
Engineer: B.J. Embo

Signature:

License Number: 0000-00

State: Oregon

Date: 10 January 1974

(Seal)

1. Name and Ownership

Name: ABC Oil Company
100 Naverspill Road
Post Office Box 100
Oilville, Washington 98000
Telephone: (123) 456-7890

Manager: John Doe
505 Oil Road
Oilville, Washington 98000
Telephone: (123) 456-0987

Owner: Same

Other

Personnel: Secretary-Bookkeeper
Dispatcher
Transport Driver
(3) Delivery People

Service

Area: King County, Washington

2. Description of Facility

The bulk plant of the ABC Oil Company handles, stores, and distributes petroleum products in the form of motor gasoline, kerosene, and No. 2 fuel oil. The accompanying drawing shows the property boundaries and adjacent highway, drainage ditches, onsite buildings, and oil handling facilities.

Fixed

Storage: (2) 20,000 gallon vertical tanks (premium gasoline)
(2) 20,000 gallon vertical tanks (regular gasoline)
(2) 20,000 gallon vertical tanks (No. 2 fuel oil)
(1) 20,000 gallon vertical tank (kerosene)

Total: 140,000 gallons

Vehicles: (1) Transport Truck
(4) Tankwagon Delivery Trucks

The bulk plant is surrounded by steel security fencing and the gate is locked closed when the plant is unattended. Two area lights are located in such positions so as to illuminate the office and storage areas.

3. Past Spill Experience

(None)

4. Spill Prevention—Storage Tanks

- 1) Each tank is UL-142 construction (aboveground use).
- 2) The main outlet valve on each tank is locked shut when the plant is unattended.
- 3) Each tank is equipped with a direct-reading gauge.
- 4) Venting capacity is suitable for the fill and withdrawal rates.
- 5) Main power switch for pumps is located in a box which is locked when the bulk plant is unattended.
- 6) A dike surrounds the tank assembly. Its volume (height vs. area) is computed based on the single largest tank within (20,000 gallons) and allowance is made for all additional vertical tank displacement volumes below the dike height (estimated spill liquid level). Total storage capacity is 140,000 gallons. A 2-inch water drain is located at the lowest point within dike enclosure and it connects to a normally-closed gate valve outside the dike.

5. Spill Prevention—Vehicular

1) Onsite

The frontal highway ditch and the ditch on the property's southern boundary intersect before crossing the highway through a culvert headed eastward and eventually to a stream located approximately one-half mile distant. Emergency containment action will constitute the erection of an earthen dam and placement of absorbent pillars at the entrance to the earthen dam and placement of absorbent pillars at the entrance to the culvert. Additional cascading of barriers will be provided as necessary.

Personnel training and drill are described herein later.

2) Offsite

Each vehicle is equipped with a shovel and two absorbent pillars. The driver is instructed to achieve emergency containment, if possible, then call the office for help immediately.

6. Personnel

All personnel have been instructed and rehearsed in the following spill prevention and countermeasure plans:

- 1) No tanks or compartments to be filled without prior checking reserves.
- 2) No pump operations unless attended continuously.
- 3) Warning signs are displayed to check for line disconnections before vehicle departures.
- 4) Instruction has been held on oil spill prevention, containment, and retrieval methods, and a "dry-run" drill for an onsite vehicular spill incident has been conducted.
- 5) Instructions and phone numbers have been publicized and posted at the office regarding the report of a spill to the EPA and the Washington State Department of Ecology.
- 6) Instructions and company regulations have been posted conspicuously which relate to oil spill prevention and countermeasure procedures.

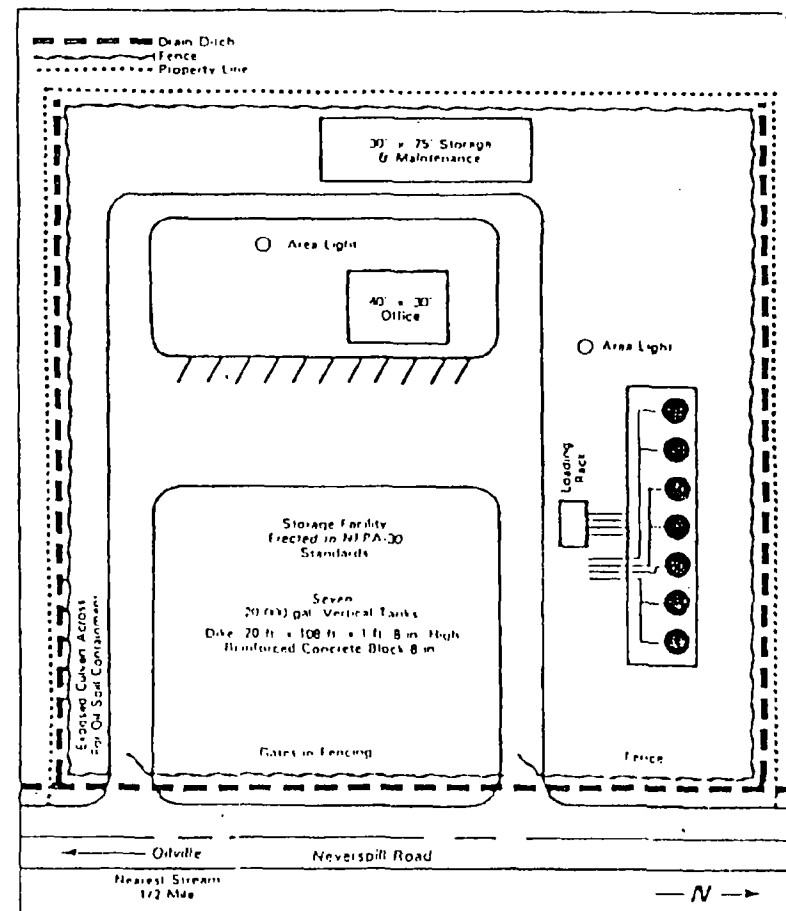
7. Future Spill Prevention Plans

By 10 January 1975 (implementation deadline) the following additional plans will be completed:

- 1) Onsite storage of spill containment and retrieval materials and equipment: bagged absorbent, absorbent pillows and booms, and tools. Storage facility will be well-publicized and clearly identified.
- 2) Installation of a sand-filled catchment basin for minor, routine spillage at loading pump intakes and at loading rack. Sand to be periodically replaced.
- 3) A routine inspection program with check-off listing of tanks, piping, valves, hoses, and pumps for the prevention of both major spills and also minor spills or leakage through proper maintenance.

John Doe

(Signature)



RCF

DEPARTMENT INSTRUCTIONS

D.I. No. 01.E005
 Date 4-5-93
 Supersedes Issue
 of 3-8-93
 C - Denotes Change

SUBJECT CORPORATE - GENERAL
 ENVIRONMENTAL COMPLIANCE AND
 SPILLS REPORTING
ISSUED BY R. P. Wollenberg

In order to ensure full compliance with environmental laws and regulations, site managers shall designate an individual to act as the Site Environmental Coordinator. This person shall have the following responsibilities:

1. Maintain knowledge of national, state, and local environmental regulations applicable to their operations.
2. Report spills, releases, incidents, inspection results and other environmental issues to the site manager and the Environmental Section Leader at Longview.
3. Conduct an annual audit of the site's environmental compliance, and send the completed audit to the Environmental Section in Longview for review and filing. Copies of the audits and any spills reports must be filed at the site for a minimum of five years. The Environmental Section will send out blank copies of the audit annually as a reminder that the audit is due.

C The following are the threshold levels of materials whose spillage into sewers going to public waste water treatment systems must be reported to the Environmental Section in Longview and to the local water treatment plant.

Substance Amount that if spilled should be reported

1. Oil	50 lbs. or 10 gal.
2. Inks	75 lbs. or 10 gal.
3. Dyes	75 lbs. or 10 gal.
4. Solvents*	140 lbs. or 20 gal.
5. Glues	420 lbs. or 50 gal.
6. Starch	600 lbs. or 50 gal.
7. Fuel	5 lbs. or .1 gal.
8. Caustic*	500 lbs. or 50 gal.
9. Acid*	500 lbs. or 50 gal.
10. Paint	75 lbs. or 10 gal.
11. Antifreeze*	1 lbs. or .1 gal.
12. Pesticides*	.1 lbs. or 1 gal.
13. Herbicides*	.1 lbs. or 1 gal.
14. Alcohol*	700 lbs. or 50 gal.
15. Defoamer	75 lbs. or 10 gal.

* These amounts are listed in various regulatory lists, there may be tighter limits in your state or county.

If any of these materials are spilled onto the ground or into a stream or lake, the event must be reported to Longview if more than two pounds (approximately 1 quart) is involved. If oil is spilled so that visible sheen results (usually 1 cup full) on the water, this event should also be reported.